

SUMMARY OF COMMENTS ON ADDENDUM 62K (April 8, 2000)

Comment	Name of commenter	Contact	Summary of comment	Proposed response
0001/001	Maury Wawryk Venmar CES Inc. Ph: 306-242-3663 F: 306-242-3484 E: mwawryk@venmarvent.com		I agree with the changes listed in Addendum K.	ACCEPT.
0002/001	Todd Veiler Venmar CES Inc. Ph: 306-242-3663 F: 306-242-3484 E: tweiler@venmarvent.com		SAME AS 0001/001	ACCEPT.
0003/001	Luc Janelle Venmar CES Inc. Ph: 306-242-3663 F: 306-242-3484 E: ljanelle@venmarvent.com		SAME AS 0001/001	ACCEPT.
0004/001	Hal Levin Building Ecology Research Gr Ph: 831-425-3946 F: 831-426-6522 E: hlevin@cruzio.com		4.1.2.1 – Delete the period at the end of the section after the word “construction” and add the following: “and the ventilation provided to the added spaces must meet the requirements of this standard.” This clarifies the intent and leaves less for misinterpretation.	REJECT The added verbiage proposed is in conflict with the exception.
0004/002	Hal Levin		4.1.2.3 – Add the words “replaces one that” after the words “a building that” in the first line and delete the words “and replaced” in the same line. This clarifies the meaning and reduces the possibility of misinterpretation.	
0005/001	Marco Giamberardino		4.1.2.3, Replacement – Rephrase	

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	BOMA International Ph: 202-326-6356 F: 202-371-0181 E:mgiamberardino@boma.org		beginning of second sentence to read "Unaltered components not being removed or replaced are not required to be brought into compliance..." This provides needed clarity.	
0005/002	Marco Giamberardino		4.1.2.4, Substantial Alterations – In b., replace "assessed value" with "replacement cost". Replacement cost offers a more accurate measure.	
0005/003	Marco Giamberardino		4.1.2.5, Change in Use – Add "for that space" to the end of the sentence. This provides needed specificity.	
0006/001	Gary Kuhl Philip Morris Mgmt Corp. Ph: 917-663-3467 F: 917-663-5849		4.1.2.1. - Retain the language from the first public review draft and renumber following sections accordingly. Thus: 4.1.2.1 Retroactive Application. <u>Except as indicated in this section, the requirements of this standard shall not be retroactively applied to existing buildings.</u> As a major building owner and tenant in North America and around the world, Philip Morris is a regular user of ANSI/ASHRAE 62-1989 and will be impacted by virtually every aspect of any revision. Philip Morris objects to this proposed independent substantive change. It should be	

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			made clear that existing buildings need not comply with the standard. Costly retrofits could be required if ASHRAE does not explicitly address this issue.	
0006/002	Gary Kuhl		<p>4.1.2.4 and 4.1.2.5 – Delete 4.1.2.4 and 4.1.2.5 and insert text from the first public review draft. Thus: <u>4.1.2.4 Substantial Alterations and Change in Use.</u> <u>If the use of space changes substantially or if a space is substantially altered, the requirements of 4.1.1 shall be met. A space shall be considered substantially altered or its use substantially changed if so triggered by the applicable prevailing building code.</u></p> <p>Philip Morris Management Corp. chose not to comment on Addendum 62k when it was released for its first public review, because we found text in the original, November 1998, draft more appropriate for an ASHRAE standard. The ISC language has become far too specific and is more suitable for a building code than for a standard.</p>	
0007/001	John Hogan Seattle Dept. of Design, Construction, and Land Use Ph: 206-386-9145 F: 206-233-7883 E:john.hogan@ci.seattle.wa.us		<p>"4.1.2.4 – "Substantial Alterations...</p> <p>a. ...or</p> <p>b. --- or</p> <p>c. <u>more than 50 percent of the ventilation system is replaced.</u></p>	

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			<p>The ventilation system is the important element. There may be cases where the building code will trigger upgrading of the ventilation system. However, there may be cases when the ventilation system is substantially revised even when other components are not. In this case, even if there are no changes made to the building envelope or the lighting system, the ventilation system should comply.</p>	
0008/001	Ed Fickes Fickes Engineering Ph: 972-423-0203 F: 972-423-7635 E: fickes@ix.netcom.com		<p>4.1.1 – Delete 4.1.1 and replace with new language. 4.1.1 – New Buildings. New, buildings falling within the scope of this standard shall comply with all sections 5 and 6 and all normative appendices apply to new buildings falling within the scope of this standard. New natural or mechanical ventilation systems in new buildings.</p> <p>This is a ventilation standard for ventilation systems, not a building standard. Therefore, stating the standard applies to buildings is not correct. This proposed change makes more sense.</p>	
0008/002	Ed Fickes		<p>4.1.2 - Delete 4.1.2. 4.1.2 Existing Buildings. 4.1.2.1 Retroactive Application. Except as indicated in this section, the requirements of this</p>	

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			<p><u>comply with all requirements of this standard.</u></p> <p>The standard deals with ventilation systems in buildings, not buildings. My added language also covers the awkwardly expressed exception in a more concise manner.</p>	
0008/004	Ed Fickes		<p>Modify 4.1.2.2 to read – 4.1.2.2 Repairs. Repairing (making operational) or <u>replacing</u> existing equipment or other <u>system building</u> components shall be allowed without requiring the <u>existing ventilation system</u> to comply with all <u>requirements of this standard.</u></p> <p>This is a ventilation standard, not a building standard, so building was deleted. The added language makes a clearer statement as to intent of standard as it applies to existing system components for repair or replacement.</p>	
0008/005	Ed Fickes		<p>4.1.2.3 – Delete 4.1.2.3, relocate language meeting intent to Section 4.1.2.2 Repairs.</p> <p>4.1.2.43 Replacement. Any component of a building that is removed and replaced shall meet the applicable requirements of Section 5 of this standard for that component. Unaltered elements are not required to be brought into compliance except as required by Section 4.1.2.5.</p> <p>Exception: Replacement of a</p>	

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			<p>standard need not be retroactively applied to existing buildings.</p> <p>There are no words left in the proposal for this subsection and the comment working implies some type of compliance without doing anything. Therefore, this section should be removed.</p>	
0008/003	Ed Fickes		<p>4.1.2.1 – Delete 4.1.2.1 and replace with new language.</p> <p>4.1.2.21 Additions to Existing Buildings. All additions to existing buildings shall meet the requirements of section 4.1.1 as if the addition were a new building.</p> <p>Exception: When an existing ventilation system is extended to serve an addition, the existing system components, such as fans and cooling and heating equipment, need not meet the requirements of this Standard. However, the extended existing system must remain in compliance with ventilation codes and standards that were in effect at the time it was permitted for construction.</p> <p><u>4.1.2.21 Additions to Existing Natural or Mechanical Ventilation Systems: All additions to existing natural or mechanical ventilation systems shall meet the requirements of section 4.1.1 without requiring the existing ventilation system to</u></p>	<p>REJECT</p> <p>The addition can be one of two things—a new ventilation system or an extension to the existing system.</p>

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			<p>building component or individual piece of equipment with a component of like size and kind provided all requirements of codes effective at the time of original system design and installation are met. For example, replacement of an air conditioning unit with one of similar capacity would not require that the ventilation rate requirements and other requirements of this standard be met.</p> <p>This has been incorporated into my proposed revisions to section 4.1.2.2 Repairs.</p>	
0009/001	Dennis A. Stanke The Trane Company Ph: 608-787-3608 F: 608-787-3608 E: dstanke@trane.com		<p>4.1.2.4 Substantial Alterations. If a building or ventilation system [1] is substantially altered, the requirements of section 4.1.1 shall be met as if the building or ventilation system were new. A building or ventilation system shall be considered substantially altered if:</p> <ul style="list-style-type: none"> a. the revision triggers a provision in the applicable prevailing building codes that requires that the building or ventilation system be brought up into compliance with [2] to the current code; or b. the cost of the revisions exceeds 50% of building's assessed value, excluding the cost of compliance with this 	ACCEPT, provided that these comments are addressed.

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			<p>standard.</p> <p>[1] The ISC adds the word "building" but should add the phrase "building or ventilation system." If only substantial alterations to the "building" are considered, floor-by-floor alterations may trigger a whole-building code upgrade (even for ventilation systems that are not addressed by the alterations), or may <i>not</i> trigger floor-by-floor ventilation system code upgrades (since the cost of ventilation system revisions is very likely to be less than 50% of the assessed value.</p> <p>[2] Since "current code" may result in either a decrease or an increase in ventilation requirements, replace "brought up to" (which implies increasing requirements) with "brought into compliance with".</p>	
0009/002	Dennis A. Stanke		<p>4.1.2.5 Change in Use. If a space application category as listed in Table 2 changes, such as from office to retail, the minimum ventilation system <u>serving the space(s) shall meet the requirements of rates required by section 6</u> shall be met.</p> <p>Since section 6 includes system ventilation requirements as well as minimum space outdoor airflow and minimum space supply airflow values, "change in use" should result in</p>	ACCEPT, provided that these comments are addressed.

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			recalculation of both space and system airflow values, not just space airflow values, as indicated by draft wording.	
0010/001	Rodney H. Lewis, PE Rodney H. Lewis Assoc., Inc. Ph: 713-975-0780 F: 713-975-1327 E: rodhlewis@earthlink.net		<p>4.1.2.4 - This section is ambiguous and could be interpreted unreasonably by building officials. This addenda does not in my opinion comply with the Colliver report or the petition which has been adopted by the Society.</p> <p>The current standard and the proposed addendas need major revision in light of the societies new policies, the rules of which are yet to be defined.</p>	
0010/002	Rodney H. Lewis, PE		<p>4.1.2.5b. - Delete and substitute: "4.1.2.5b: A significant change in occupancy, either in occupants or increase in contaminant sources." Language similar to the proposed addenda was omitted from the uniform building code because of the many definitions of costs.</p> <p>This section is ambiguous and could be interpreted unreasonably by building officials. This addenda does not in my opinion comply with the Colliver report or the petition which has been adopted by the Society. The current standard and the proposed addendas need major revision in light of the societies new policies, the rules</p>	

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			of which are yet to be defined.	
0010/003	Rodney H. Lewis, PE		<p>This section is way too complicated. Simplify.</p> <p>This addenda does not in my opinion comply with the Colliver report or the petition which has been adopted by the Society. The current standard and the proposed addendas need major revision in light of the societies new policies, the rules of which are yet to be defined.</p>	